

SILLS CUMMIS & GROSS P.C.

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Attorneys for Plaintiff

Johnson & Johnson Health Care Systems Inc.

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

JOHNSON & JOHNSON
HEALTH CARE SYSTEMS INC.,

: Civil Action No. 22-2632(JKS)(CLW)

Plaintiff,

: Hon. Jamel K. Semper, U.S.D.J.

v.

SAVE ON SP, LLC, EXPRESS
SCRIPTS, INC., AND ACCREDO
HEALTH GROUP, INC.,

: Hon. Cathy L. Waldor, U.S.M.J.

: Hon. Freda L. Wolfson, Special Master

Defendants.

NOTICE OF MOTION TO SEAL

COUNSEL:

PLEASE TAKE NOTICE that on November 4, 2024 at 9:00 a.m., or as soon thereafter as counsel may be heard, the undersigned attorneys for plaintiff Johnson & Johnson Health Care Systems Inc. ("JJHCS"), together with counsel for

defendant Save On SP, LLC (“SaveOnSP”), will apply before the Honorable Freda L. Wolfson, Special Master at the United States District Court for the District of New Jersey, Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, New Jersey 07101, for an Order:

- (a) Permanently maintaining under seal the letters and supporting exhibits filed by the parties in connection with (i) SaveOnSP’s Motion to Compel JJHCS to Produce Documents Regarding JJHCS’s Mitigation Efforts by Its Vendors TrialCard and RISRx, dated August 30, 2024, with related briefing dated September 9, September 16, and September 18, 2024 (ECF Nos. 372, 376, 382 & 385, filed September 10, September 18, and September 19, 2024) (the “Mitigation Motion”); and (ii) SaveOnSP’s Motion to Compel JJHCS to Add Incelli and Khalil as Custodians, dated August 26, 2024, with related briefing dated September 10 and September 19, 2024 (ECF Nos. 356, 378 & 388, filed August 27, September 10, and September 20, 2024) (the “Incelli/Khalil Motion”);
- (b) Permitting JJHCS to file the proposed public versions of ECF Nos. 372, 376, 382 & 385; and ECF Nos. 356, 378 & 388, attached as Exhibits A and B to the Declaration of Jeffrey J. Greenbaum submitted in support of this motion (“Greenbaum Declaration”).

PLEASE TAKE FURTHER NOTICE that in support of this motion, JJHCS will rely on the accompanying Greenbaum Declaration and the indices in support of this motion. A proposed form of Order is also attached.

PLEASE TAKE FURTHER NOTICE that pursuant to L. Civ. R. 7.1(d)(4), no brief is necessary inasmuch as the application presents issues that are a matter of familiarity to the Court.

Respectfully submitted,

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Dated: October 8, 2024